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November 12, 1991

HAND DELIVERY

Mr. Randy Sturgeon
U.S. Environmental Protection Agency
841 Chestnut Building, 9th Floor
Philadelphia, PA 19107

Re: Contract No. 68-W9-0005 (TES VIII)
Work Assignment No. C03095
RI/FS Dover Gas Light
Interim Report
Pathway Analysis

Subject: Technical Review Comments

Dear Mr. Sturgeon:

Dynamac is submitting two copies of the draft letter report containing technical review comments on the Off-site Pathway Analysis for the Dover Gas Light Site. The Off-site Pathway Analysis was prepared for Chesapeake Utilities Corporation, by Versar, Inc., on October 10, 1991.

Dynamac suggests a meeting be held between EPA and Dynamac to review and discuss these comments prior to submittal to the Potentially Responsible Parties.

If questions or comments arise concerning this review, please do not hesitate to contact Dynamac Corporation at (215) 889-3900.

Sincerely,

DYNAMAC CORPORATION

Camille Costa, P.E.
Engineering Manager

Enclosure

cc: Ms. Donna McGowan, EPA Region III CERCLA RPO
Mr. Robert Stecik, Jr., Dynamac, Philadelphia Operations

Corporate Headquarters: The Dynamac Building, 2275 Research Boulevard, Suite 500, Rockville, MD 20850-3268

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Re: Contract No. 68-W9-0005
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Subject: Technical Review Comments

Dear Mr. Sturgeon:

The Off-site Pathway Analysis study, prepared by Versar, Inc., dated October 10, 1991, was reviewed for technical adequacy.

The following documents were used as reference in conducting the review:

* Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, EPA/540/G-89/004, October 1988.

* National Oil and Hazardous Substance Pollution Contingency Plan, 40 CFR 300.68.

* RI/FS Work Plan for the Dover Gas Light Site, prepared for the Chesapeake Utilities Corporation, by Versar, Inc., on January 10, 1991.

The objective of this review is to ensure that the Off-site Pathway Analysis was performed in accordance with the reference documents and to determine the usability of the data in any additional environmental impact analysis.

Corporate Headquarters: The Dynamac Building, 2275 Research Boulevard, Suite 500, Rockville, MD 20850-3268

Specific comments on the Off-site Pathway Analysis are the following:

Comment No. 1: Section 4.3, Analytical Results

The results of the soil borings indicate "It is possible that site-related constituents may have migrated off the site via runoff and were adsorbed to the soil surface in the area between the site and Tar Branch. It is also possible that the detected PAH compounds could have been deposited in these boring locations by various means, such as spraying of asphalt-related materials on old road beds or as a preparation of new road surfaces, spillage, or placement of contaminated fill." The study goes on further to conclude, on page 24, that there is no conclusive evidence to suggest that a definite pathway exists or existed at any time. Dynamac suggests that additional soil borings be taken on the southwest side of Tar Branch to support the report's conclusion that PAH contamination levels are possibly the result of spraying roads with tar or placing contaminated fill.

Additionally, eight (8) of the ten (10) soil borings were drilled through paved surfaces, where the likelihood of detecting PAHs is high. Based on a review of RI/FS Interim Report "Pathway Analysis", it is Dynamac's opinion that these sample locations may have been selected with the reasoning that there would be inconclusive evidence to prove that the contamination was soley due to past Dover Gas Light site activities. (According to the report, it was common knowledge that the city used to spray tar on the road surfaces as a means of dust suppression). In order to draw more conclusive evidence as to whether or not the Dover Gas Light site is the source for offsite contamination, additional samples could be collected in areas away from paved surfaces and along the original surface runoff pattern.

Comment No. 2: Section 5.3, Stormwater Sampling

Table 4, page 16, indicates that no reading (NR) is available for the dissolved oxygen level for storm flow, in Tar Branch, at sites 1 through 3. However, in the discussion, the five day biological oxygen demand, BOD_5, concentrations were quoted as "minimal at each sampling location, essentially at or below detectable levels". Dynamac suggests that the dissolved oxygen readings be included in Table 4.

Comment No. 3: Section 5.1, Paragraph 2

It is unclear if individual water sampling collection devices were used at each sample location or if one unit was decontaminated after each use. As the report reads now, it appears that the sampling device was not decontaminated prior to collecting the next sample.

Comment No. 4: Table 2, Page 9

The instrument used to determine headspace concentrations was not indicated in the table. It is Dynamac's understanding that if an HNu photoionizer is used to determine VOC concentrations, the readings may be erroneous due to the moisture content that may make up a considerable portion of the headspace. Additionally, calibration logs for the field equipment used during the project were not included in the report.

It is Dynamac's opinion that the incorporation of these comments will improve the quality of the Remedial Investigation/Feasibility Study. In general, it appears as though Versar, Inc., did a credible job preparing the document. However, Dynamac Corporation strongly suggests that additional soil borings be performed on the southwest side of Tar Branch.

If questions arise concerning these comments, please do not hesitate to contact Dynamac Corporation at (215) 889-3900.

Sincerely,

DYNAMAC CORPORATION

for Carlosta

Terrence J. McKenna, EIT
Staff Engineer